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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Ms. J.P., et al.,

Plaintiffs,

v.

WILLIAM P. BARR, et al.,

Defendants.

Case No. 2:18-cv-06081-JAK-SK

Assigned to the Hon. John A. Kronstadt
and the Hon. Steve Kim

**NOTICE OF MOTION AND
MOTION TO COMPEL
SUPPLEMENTAL DISCOVERY
RESPONSES AND FULL
PRODUCTION FROM
DEFENDANTS IN RESPONSE TO
PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION**

Date: February 5, 2020

Time: 10:00 a.m.

Place: Roybal Federal Building and
United States Courthouse

255 E. Temple Street
Courtroom 540
Los Angeles, CA 90012
Action Filed: July 12, 2018
Discovery Cutoff Date: October 5, 2020
Pretrial Conference: TBA
Trial Date: April 20, 2021

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PLEASE TAKE NOTICE that on February 5, 2020 at 10:00 a.m., or as soon thereafter as the matter may be heard, in the above-mentioned court at Roybal Federal Building and United States Courthouse, 255 East Temple Street, Los Angeles, CA, 90012, Courtroom 540, before the Honorable Steve Kim, Plaintiffs Ms. J.P., Ms. J.O., and Ms. R.M., on behalf of themselves and all others similarly situated (“Plaintiffs”) will and hereby do respectfully move for an order to compel Defendants William P. Barr, Kevin K. McAleenan,¹ the Department of Homeland Security, United States Immigration and Customs Enforcement, United States Customs and Border Protection, Alex M. Azar II, the Department of Health and Human Services, Jonathan H. Hayes, Office of Refugee Resettlement, David Marin, Lisa Von Nordheim, Marc Moore, and Lowell Clark (collectively “Defendants”) to supplement their responses and produce all documents that are responsive to Document Request Nos. 1-16 in Plaintiffs’ First Set of Requests for Production to Defendants (“Document Requests”).²

As explained more fully in the Joint Stipulation and Declaration of Kevin M. Fee filed concurrently herewith, the parties met and conferred prior to the filing of this motion pursuant to Local Rule 37 and Federal Rule of Civil Procedure 37 but were unable to resolve their dispute and thus require the Court’s assistance. *See* Fee Decl., filed concurrently herewith. This Motion is based upon this Notice of Motion, the Joint Stipulation of Plaintiffs and Defendants pursuant to Local Rule 37-2, the declarations of counsel filed herewith, all pleadings and papers on file in this action,

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¹ Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Acting Secretary of Homeland Security Chad F. Wolf is substituted for the former Acting Secretary Kevin K. McAleenan.

² These are filed as Exhibit C to the Declaration of Kevin M. Fee in Support of Plaintiffs’ Motion to Compel (“Fee Decl.”), filed concurrently herewith.

1 and upon other such evidence and argument as may be presented to the Court at or
2 before hearing on this Motion.

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4 Date: January 15, 2020

SIDLEY AUSTIN LLP

5 By: /s/ Amy P. Lally

Amy P. Lally

6 Ellyce R. Cooper

7 *Attorneys for Plaintiffs*
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CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 1999 Avenue of the Stars, 17th Floor, Los Angeles, California 90067.

On January 15, 2019, I served the foregoing document(s) described as **NOTICE OF MOTION AND MOTION TO COMPEL SUPPLEMENTAL DISCOVERY RESPONSES AND FULL PRODUCTION FROM DEFENDANTS IN RESPONSE TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION** on all interested parties in this action by the method described below:

I electronically filed the foregoing with the Clerk of District Court using its CM/ECF system, which electronically provides notice.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Amy P. Lally
Amy P. Lally
Attorney for Plaintiffs